



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1350 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Russell Deppe
Waste Enforcement Manager
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218-1105

June 5, 2014

RE: RCRA Notice of Violation
Wolverine Advanced Materials
VAD065408692

Dear Mr. Deppe:

The U.S. Environmental Protection Agency Region III is pursuing the issuance of a Notice of Violation (NOV) to Wolverine Advanced Materials, Blacksburg Facility, in Blacksburg, VA pursuant to the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984. The NOV will address violations of RCRA Subtitle C.

I appreciate your cooperation in this matter and look forward to your continued efforts toward a successful enforcement program. Should you have any questions regarding this matter, please contact me at (215) 814-5430 or Ken Cox at (215) 814-3441.

Sincerely,

Carol Amend, Associate Division Director
Land and Chemicals Division
Office of Land Enforcement

cc: K. Cox, 3LC70

INSPECTION REPORT

for

RCRA Subtitle C

at

WOLVERINE ADVANCED MATERIALS
Blacksburg Facility

201 Industrial Park Road

Blacksburg, VA 24060

VAD065408692

Large Quantity Generator

Inspection Date

May 7, 2014

Kenneth J. Cox
Land and Chemicals Division
May 15, 2014

Wolverine Advanced Materials
Blacksburg, VA 24060
May 7, 2014

VAD065408692

Inspectors:

Kenneth J. Cox - USEPA (215-814-3441)
Rebecca Wright - VADEQ (540-562-6811)

Facility Representative:

Phillip Hunt - EHS Manager (540-552-7674)

Background

Wolverine Advanced Materials (Wolverine/Blacksburg or the Facility) was selected for inspection by EPA's Land and Chemicals Division, Office of Land Enforcement as part of its FY 14 inspection plan. The purpose of the inspection was to assess Wolverine's compliance with regulation under Resource Conservation and Recovery Act (RCRA). The Virginia Department of Environmental Quality (VADEQ or DEQ) was notified two weeks in advance and sent inspector Rebecca Wright as their representative. All facts in this report are based on the inspectors' observations, comments by the facility representatives, or documents reviewed before, during, or after the on-site inspection.

Opening Conference

Wolverine operates two facilities within a quarter mile of each other in the same industrial park. The other plant, called the Cedar Run Plant, is primarily a production facility. The two plants make the same product, rubber coated steel gaskets. Each plant operates two process line on a 24/7 basis. Managers, salaried employees, and some maintenance staff share responsibilities between the two sites. The inspectors entered the facility shortly after 11:30 AM after inspecting the Cedar Run facility. We were again accompanied by Mr. Hunt and taken to a conference room. Credentials were shown and the purpose of the inspection was identified earlier.

Manufacturing Processes

Wolverine manufactures rubber coated steel gaskets from coiled sheet steel. They offer 65 composites and more than 400 grades of materials that they bond to the steel to meet their customer's demands. The rubber coating, which functions as sound and vibration dampeners can

be applied to one or both sides of the rolled steel. They also apply adhesives to the gaskets if self-sticking gaskets are specified.

The Blacksburg plant has two process lines and also has additional slitting and stamping lines which produce the final product.

The process starts with the 3 foot wide coiled steel sheet moving through a mild acid wash (pH between 4.7 and 5.2) stage to remove dirt and oil. It continues right to the coating process and then rewound into coils. All of the processes take place in enclosed unit.

Waste Generation

Oily wastewater from the washing process is shipped off site as nonhazardous wastewater.

Wolverine offers a large variety of formulations which requires frequent flushing and cleaning of the rubber and adhesive application process equipment when the formulation changes. This is done by pumping solvent through the system. Solvents (Toluene, MEK, and Ethyl Acetate) change by the formulation of the coating being cleaned. Waste is accumulated in satellite drums at the point where the solvent flush exits the system. Satellite drums are moved to the waste prep area where partial drums are combined manually prior to being sent to the outside 90 day storage area (Photo #8). All waste is managed in drums. Although hazardous waste storage is fairly large, shipment are made every two weeks or so. Weekly inspection are conducted by Mr. Hunt and recorded.

About once a year the facility generates a drum of chromic acid from a specific process. Likewise a single drum of selenium shavings is infrequently generated.

Observations

The inspectors walked the productions line observing the satellite accumulation areas at point the equipment cleaned (Photo #1). At two different location the small bung in the waste solvent drum was removed (Photo #2). All the satellite drums observed were properly labeled.

Spent fluorescent bulbs were observed uncontained or in an open box; however, all the bulbs were low mercury bulbs (Photo #3). The universal waste storage location was in a closet (Photos #11 - #14). There were two boxes labeled as universal waste that were closed and dated. There were three 12' bulbs the were not in a container, however they were low mercury bulbs.

Next the inspector went to the prep area (Photo #6) where partially full satellite drums are brought to be combined into full containers prior to moving to the 90 day storage area. There was one open drum (Photo #7) that was about $\frac{3}{4}$ full. No one was working in the area at the time.

The inspector next observed the outdoor 90 day storage pad. There were four drums present, all dated within the last week. (Photos #8 & #9).

At the end of the plant tour we were taken to the location of the aerosol drum to puncturing device was located (Photo #10). The unit was closed and labeled hazardous waste.

Record Review

CONTINGENCY PLAN – With the exception of the evacuation plan, the same contingency plan (Attachment A) is used for both Blacksburg and Cedar Run plants. The plan was last updated 10/22/13. A recent change in the occurred in the emergency coordinators list with the EHS Manager changing from Chris Simione to Phillip Hunt. The emergency coordinators contact information lists on cell phone numbers which were observed to be used extensively for inter and intra plant communications.

TRAINING – Training is given annually to almost all employees (Attachment B). Training is given by the EHS manager who receives training at an off-site class (Attachment C). The EHS manager appears to be the only emergency coordinator to be trained annually.

Job descriptions for the EHS manager and the mix room operators who manage hazardous waste have waste related duties listed, the remainder of the emergency coordinators do not (Attachment D).

MANIFESTS – Records for the last couple of years were checked. When the records were given to the inspectors we were told the facility was aware the returned final copy of some manifest were missing for 2014 and that they were in the process of getting copies from the TSD. The inspector found three missing final manifests: #007459988FLE shipped 4/16/14, #007459717FLE shipped 3/19/14, and #007460788FLE shipped 2/31/14(?).

BIENNIAL REPORT – Attachment E

Exit Conference

Prior to leaving the facility inspectors discussed their findings with the facility representatives.



Photo #1 - Satellite are in the process area. Drum on left is for solid hazardous waste (debris) and the drum in the middle is for hazardous waste liquids. The drum on the right is the clean solvent used to clean the rubber application equipment.

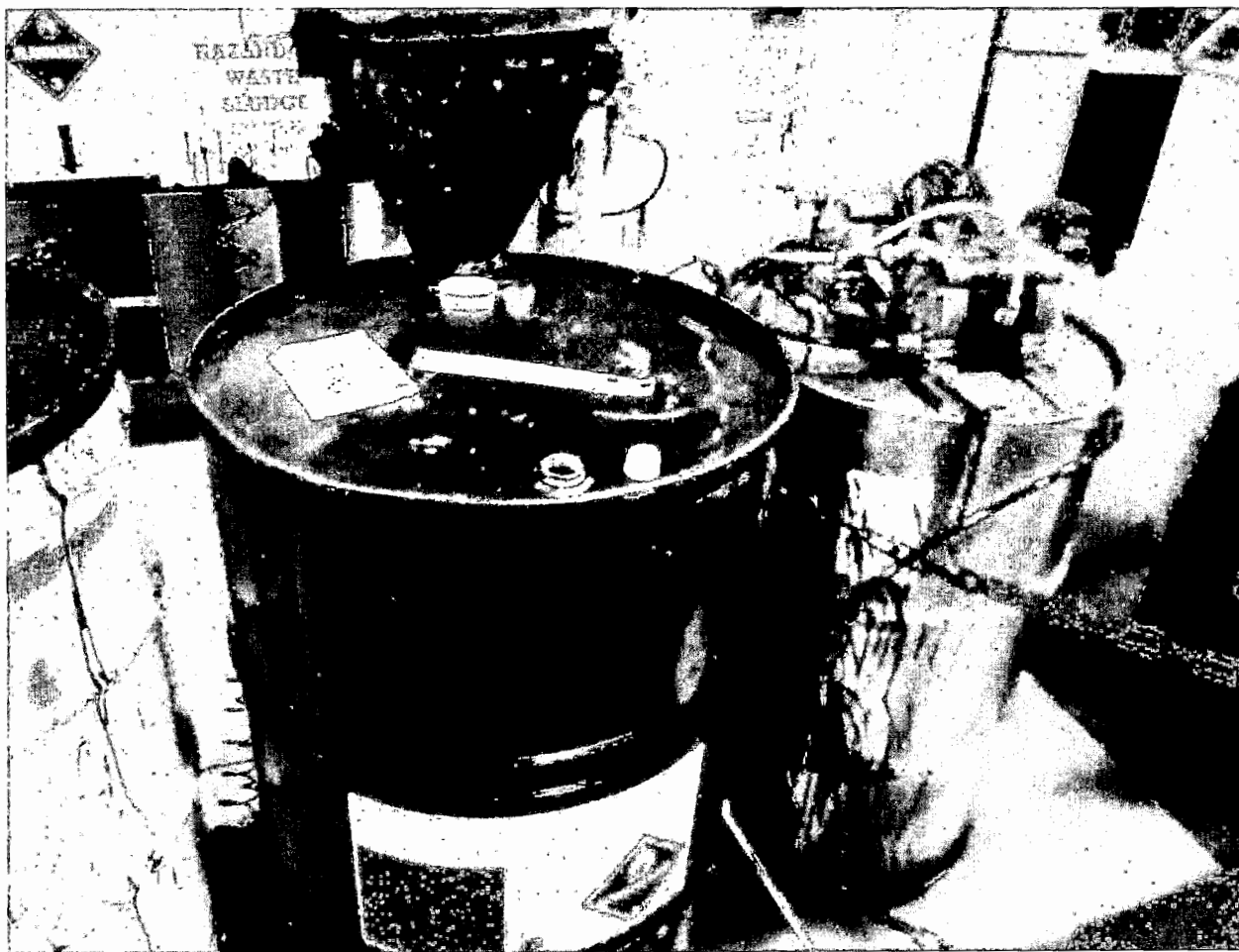


Photo #2 – Satellite drum in Photo #1 with small bung removed.

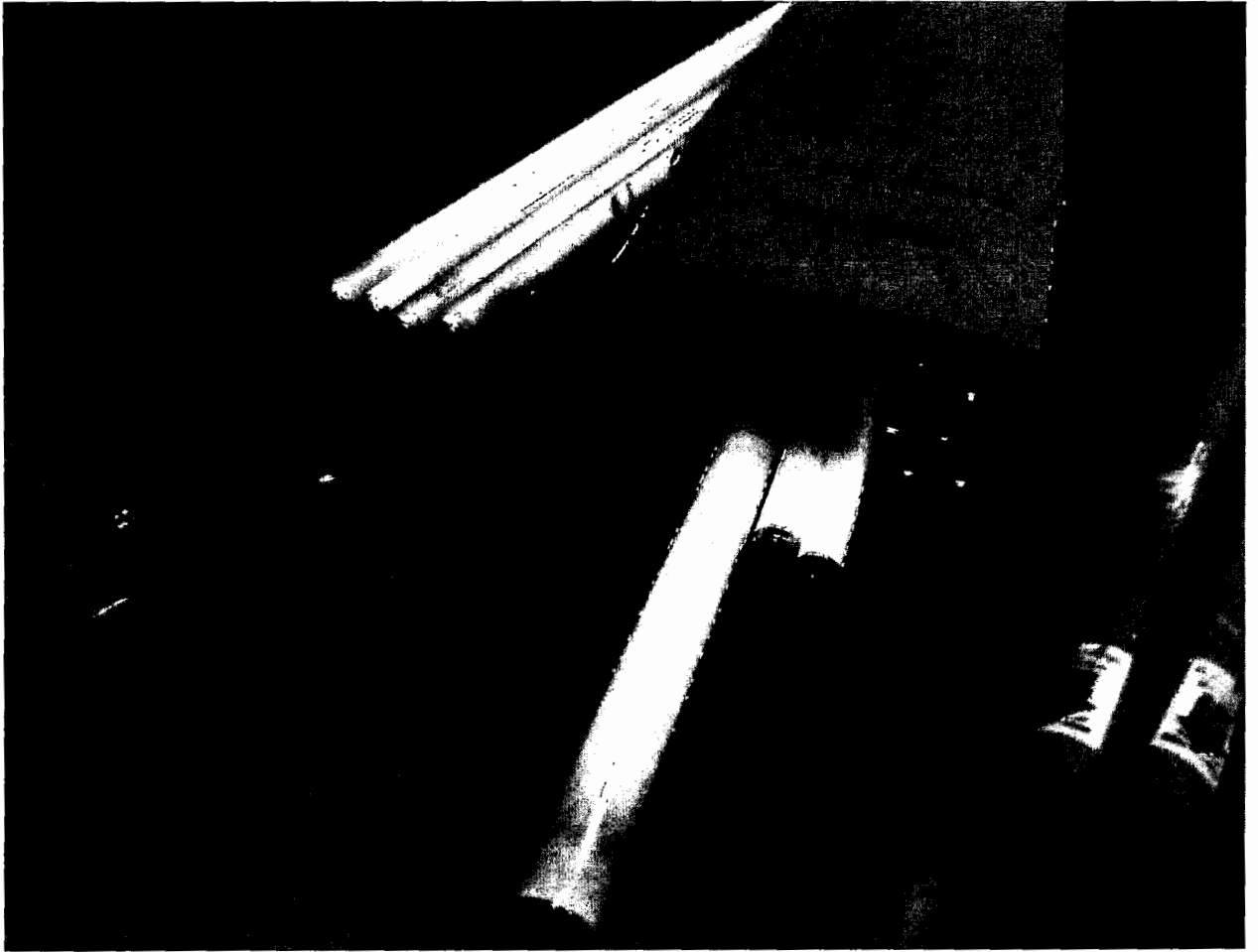


Photo #3 – Spent bulbs storage area. All bulbs were low mercury/non-hazardous.

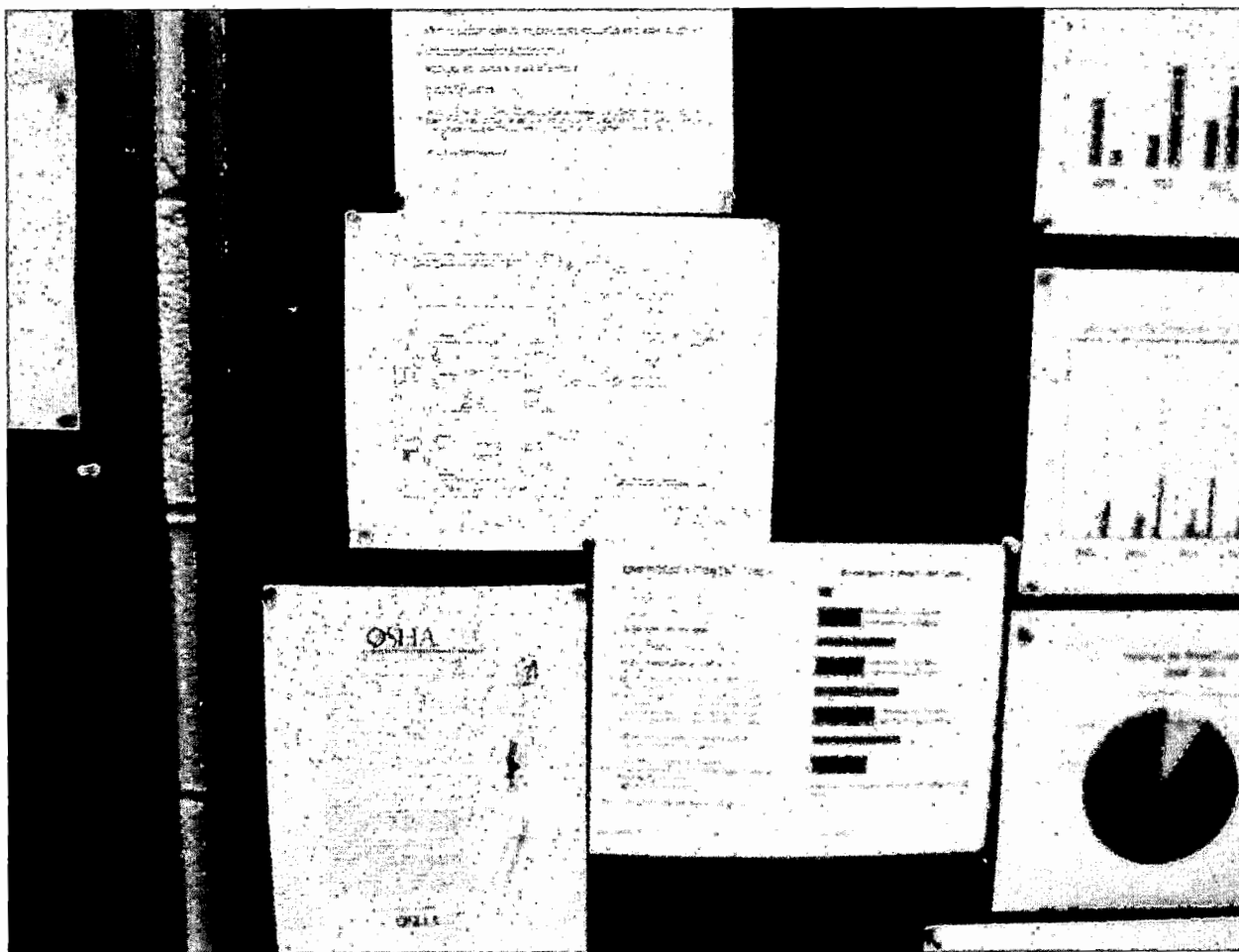


Photo #4 – Emergency information posted in the process area.



Photo #6 – Prep area where drums of waste are combined prior to being sent to 90 day storage area. The covered drums on the right are holding rubber waiting to go to the process line.



Photo #7 – Open drum of hazardous waste in the prep area. The drum was $\frac{3}{4}$ full.

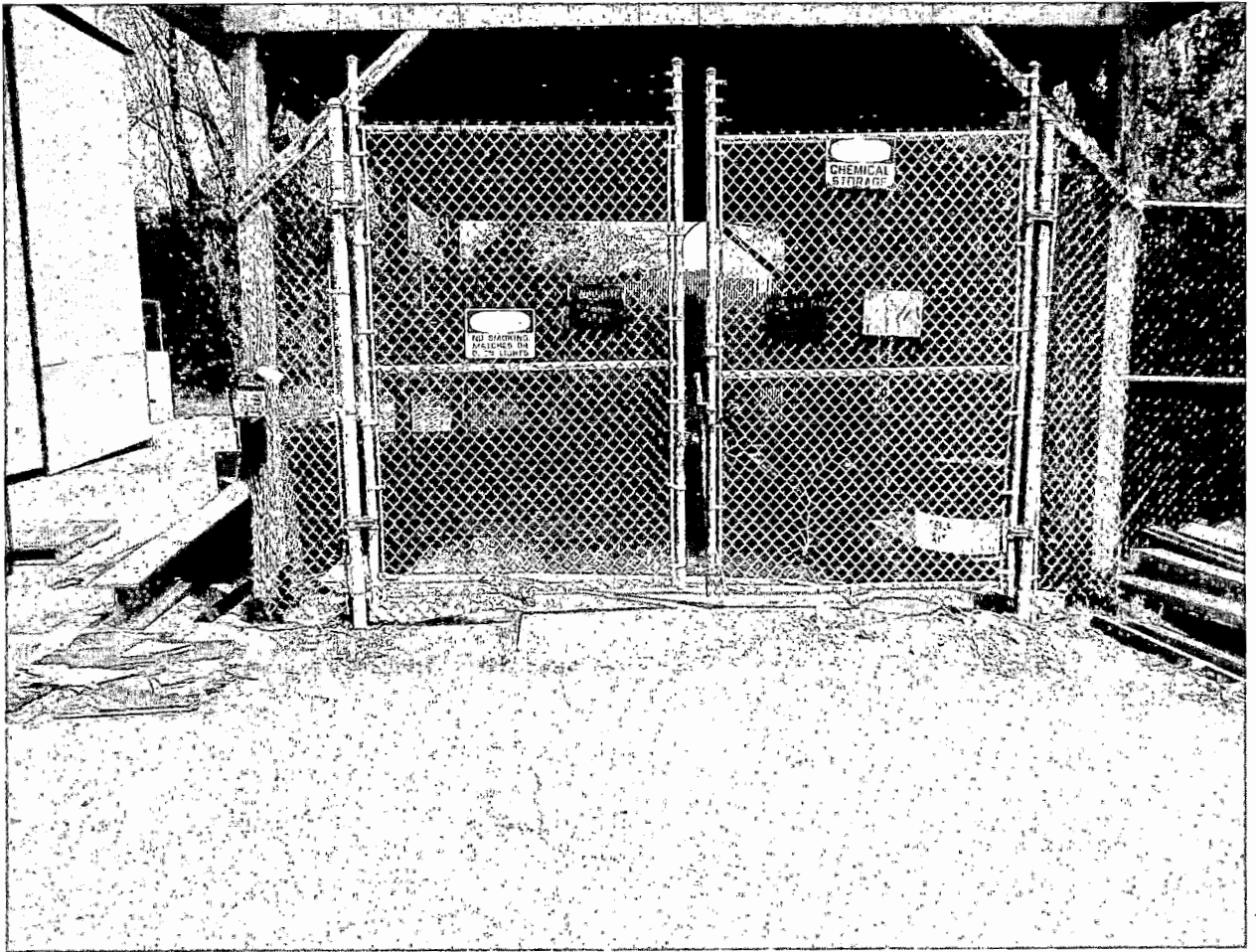


Photo #8 – 90 Day storage area.

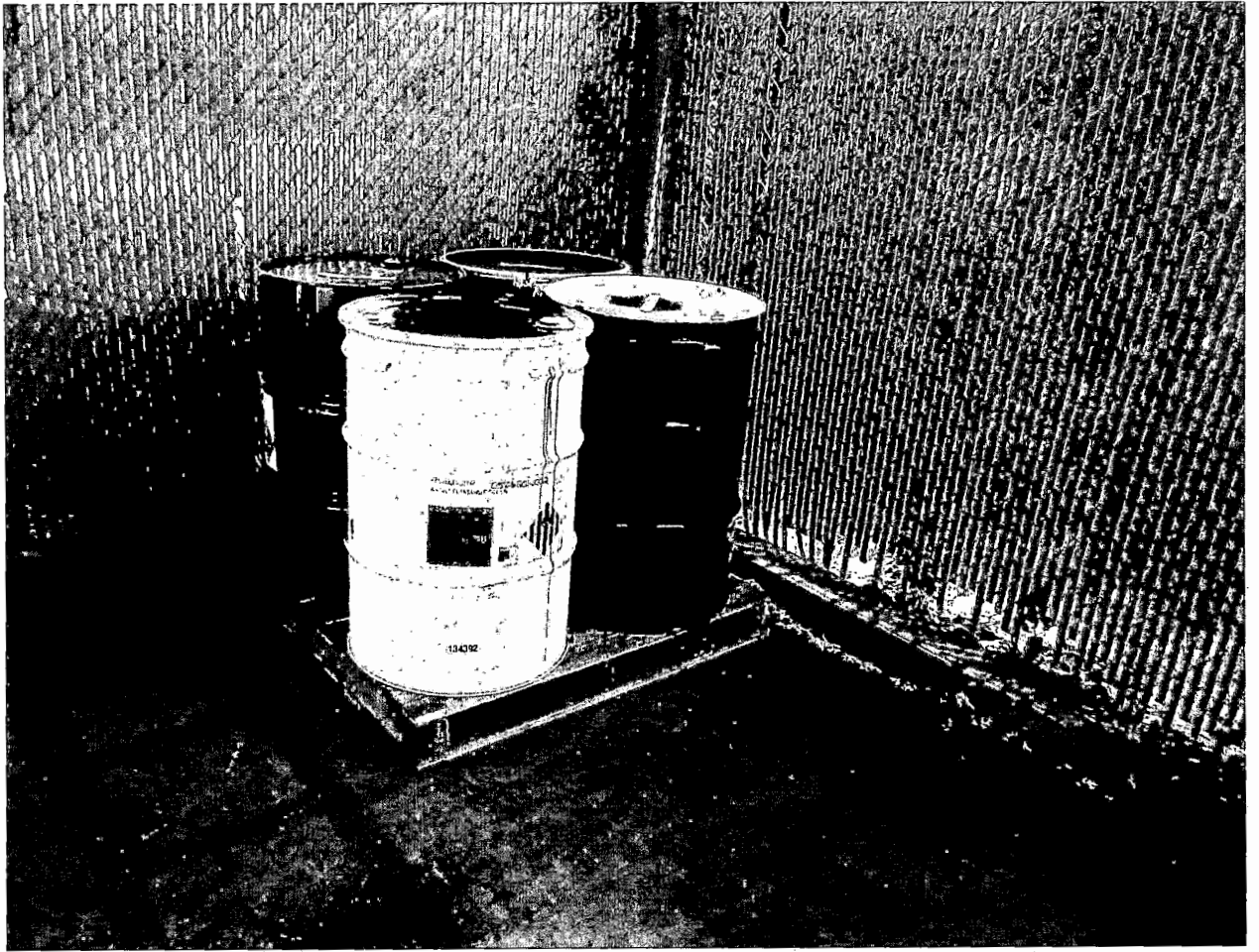


Photo #9 – Four drum on storage pad were closed, labeled, and dated between 5/4/14 and 5/6/14.

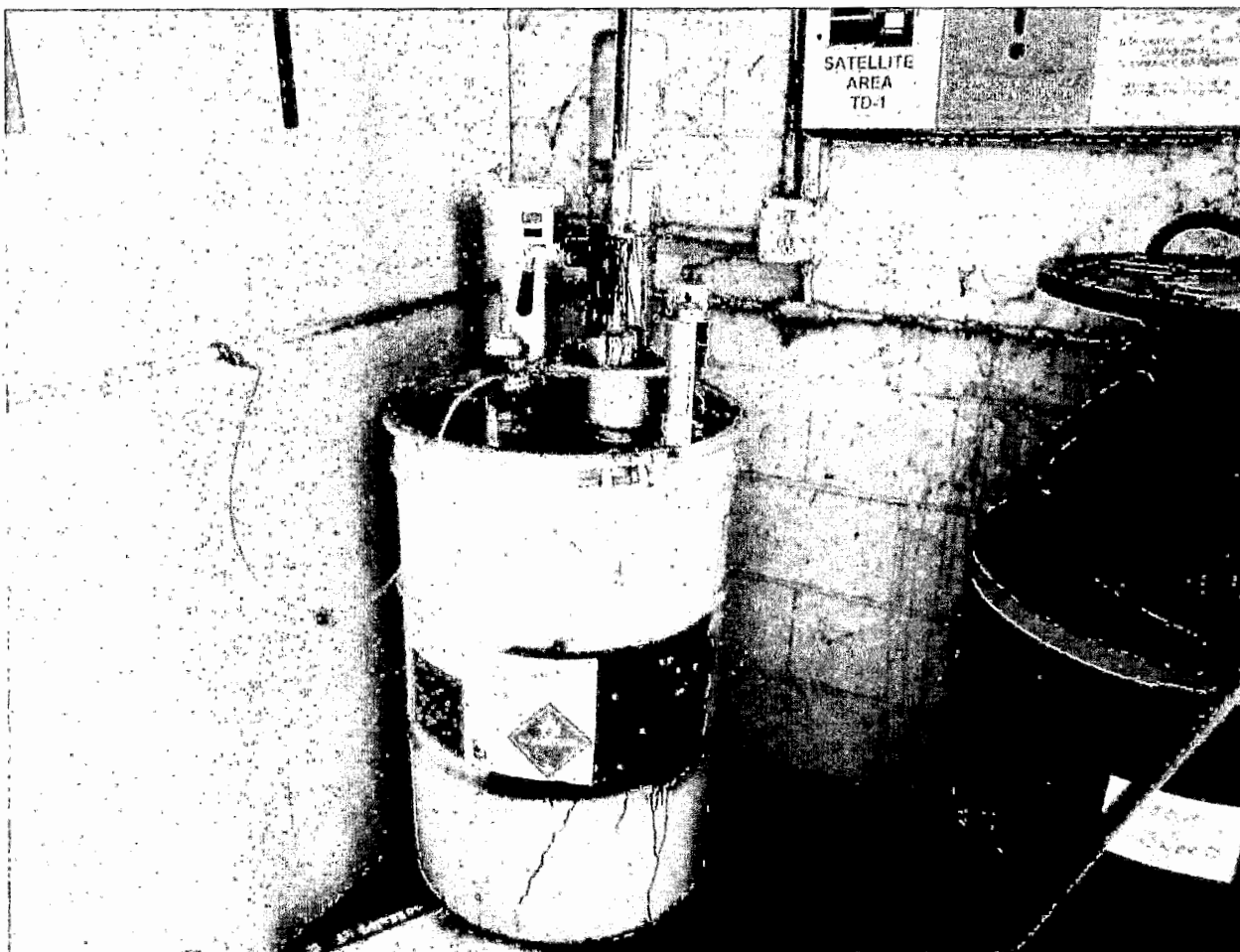


Photo #10 – Aerosol can puncturing unit.

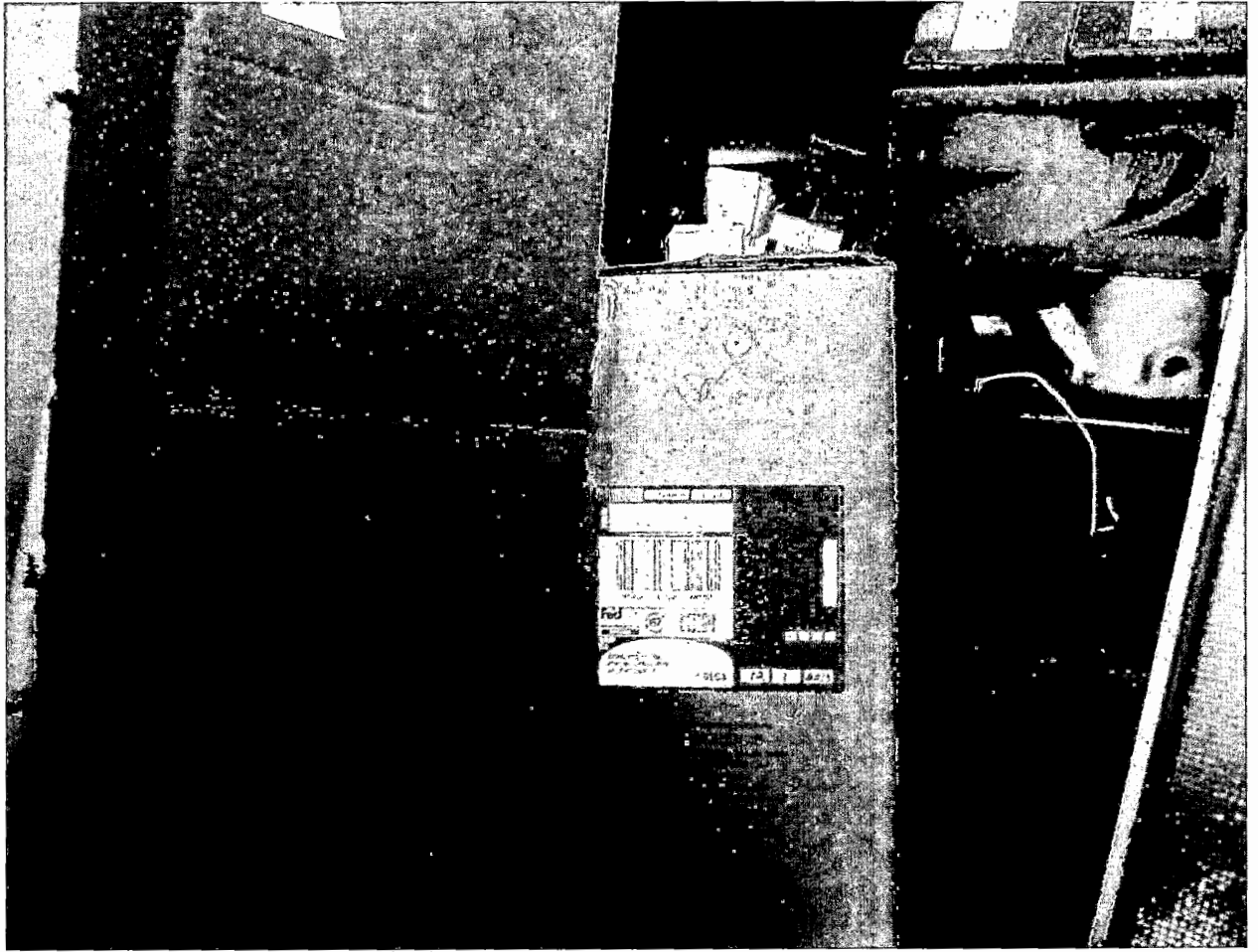


Photo #11 – Universal waste bulbs stored in closed, labeled, and dated boxes.



Photo #12 – Lose 12' bulbs were non-hazardous.

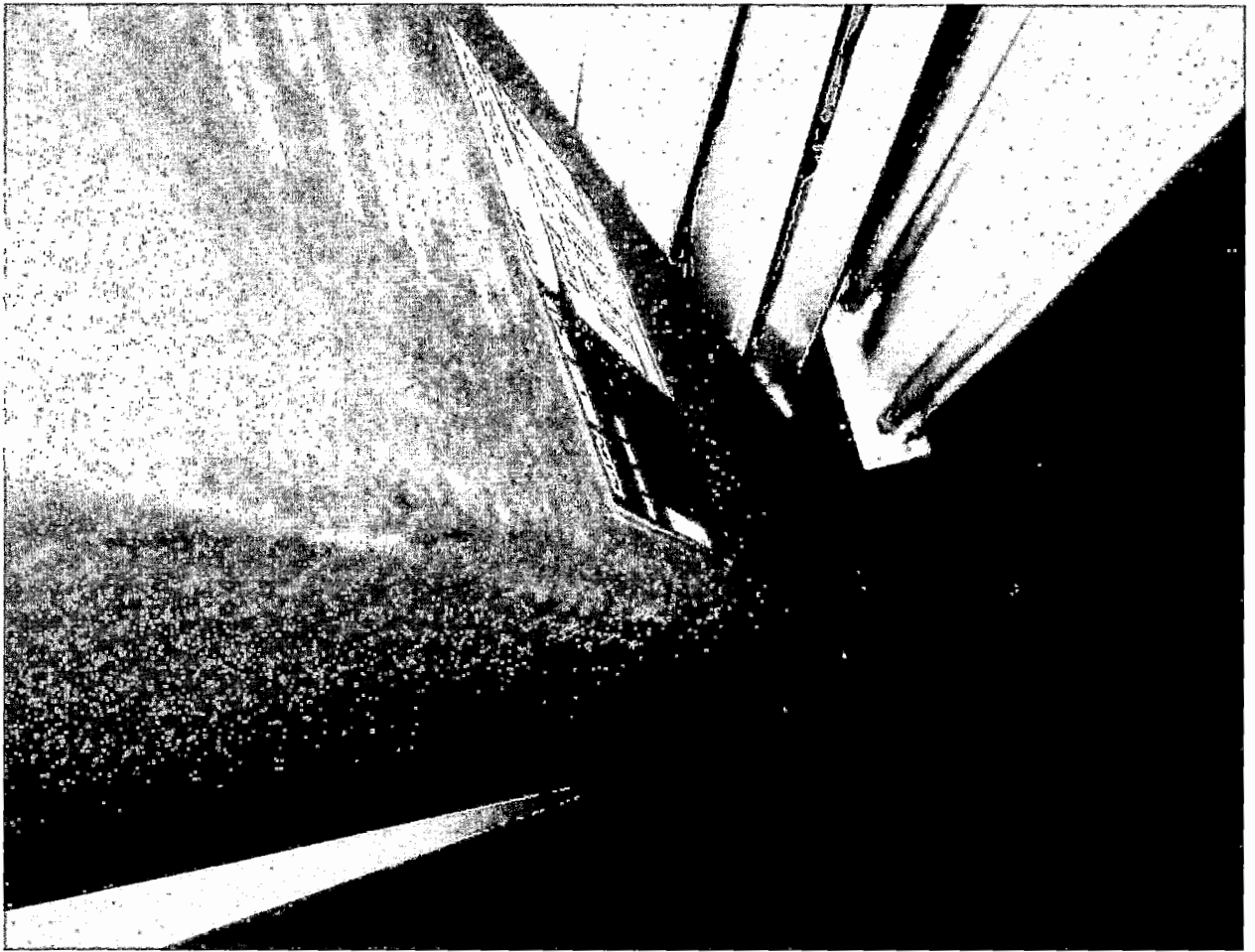


Photo #13 – Universal waste label.



Photo #14 – Universal waste box date.